

Schweizer, Jonathan

From: Cahn, Jeffrey
Sent: Wednesday, October 19, 2016 11:13 AM
To: Ellens, Newton
Cc: Vantil, Barbara; Schweizer, Jonathan
Subject: RE: Phone call with Linda Verhulst, Sangamon County Water Reclamation District (formerly Springfield Metro Sanitary District)

Thanks Newton.

Regards,

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From: Ellens, Newton
Sent: Wednesday, October 19, 2016 11:11 AM
To: Cahn, Jeffrey <cahn.jeff@epa.gov>
Cc: Vantil, Barbara <vantil.barbara@epa.gov>; Schweizer, Jonathan <schweizer.jonathan@epa.gov>
Subject: Phone call with Linda Verhulst, Sangamon County Water Reclamation District (formerly Springfield Metro Sanitary District)

Hey Jeff,

Today, I spoke with Linda Verhulst of the Sangamon County Water Reclamation District about their August 30, 2016 correspondence to us. The correspondence was in response to EPA's July 22, 2016 "Area of Concerns" letter to Sangamon County. I told Ms. Verhulst that they had resolved many of the concerns we had about the Sangamon County, but we have the remaining (and additional) concerns:

- **Ensure proper categorical determination and limits are included in permits:**
 - Aramark, MD Designs, and S. Sangamon County are not subject to 40 CFR Part 413. The permits for Aramark and MD Designs, however, reference 40 CFR Part 413 in Part 4 (Special Conditions), Subpart H. The permit for S. Sangamon County Water Commission references 40 CFR Part 413 in Part 4 (Special Conditions), Subpart J.
 - Magro's Meat and Produce is subject to 40 CFR Part 432. The associated IU permit has limits under this part; however, these are direct discharge limits. 40 CFR Part 432 does not include any pretreatment limits.

- Contech Construction Products, Inc. is subject to 40 CFR Part 463. The associated IU permit has limits under this part; however, these are direct discharge limits. 40 CFR Part 463 does not include any pretreatment limits.
- **Failure to include monthly average limits in IU Permits:**
 - MD Designs and Henry Technologies are subject to 40 CFR Part 433. These IUs are subject to monthly average limits. The permits for these IUs, however, don't include monthly average limits for nickel.
- **TTO as a local limit:** I noted that the Sangamon County SUO includes a local limit for total toxic organics (TTO). TTO actually is a unique set of organics under a specific number of industrial categories (e.g., metal finishing, electroplating, copper forming). If Sangamon County determined that it needed a TTO local limit, then it must specifically define which set of organics are TTOs.
- **The City of Springfield (Public Utility):** The City of Springfield is subject to 40 CFR Part 423. This part includes a prohibition on PCB discharges. The City of Springfield permit, however, does not include such a prohibition.

Ms. Verhulst said that she would address each of the remaining concerns. She told me that she is working with Jonathan Schweizer on the County's pretreatment program modifications. I told her that she should work with Mr. Schweizer on program modification issues raised by my comments (e.g., changing or removing the TTO limit in the SUO). Finally, I told her that if she would get back to me with a timetable for addressing these items, then I would document the timetable in a written response.

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